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ATTORNEYS FOR CHASE BANK USA, N.A.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

BRANDON WAYNE BYRD,
Plaintiff,

v.

CHASE BANK USA, N.A.
D/B/A CHASE,
Defendant.

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CIVIL ACTION NO. 3:15-cv-00098-G

UNOPPOSED MOTION FOR PROTECTIVE ORDER

TO THE HONORABLE A. JOE FISH, UNITED STATES DISTRICT JUDGE:

Chase Bank USA, N.A. ("CB USA"), the defendant, files this Unopposed Motion for Protective Order and in support hereof would respectfully show the Court as follows:

1. Brandon Wayne Byrd (the "Plaintiff") commenced this lawsuit by filing his Complaint on January 13, 2015.

2. The parties are engaged in informal discovery and anticipate engaging in formal discovery. CB USA requests entry of a protective order to protect its confidential and proprietary information that might be disclosed in discovery. The parties have approved and agreed to the terms of a protective order for confidential information, and an Agreed Protective Order is being submitted with this Motion.

3. The Plaintiff does not oppose the relief requested in this Motion and have agreed to entry of the Agreed Protective Order being submitted with this Motion.

WHEREFORE, PREMISES CONSIDERED, CB USA requests that the Court enter the Agreed Protective Order being submitted with this Motion.

Respectfully submitted,

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By: /s/ Kenneth A. Hill
Wm. Lance Lewis
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ATTORNEYS FOR CHASE BANK USA, N.A.

CERTIFICATE OF CONFERENCE

The Plaintiff does not oppose the relief requested in this Motion and has agreed to entry of the Agreed Protective Order being submitted with this Motion.

/s/ Kenneth A. Hill
Kenneth A. Hill

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served concurrently with the filing of the same via the Court's CM/ECF noticing system upon all persons who have filed ECF appearances in this case, including counsel for Plaintiff.

/s/ Kenneth A. Hill
Kenneth A. Hill

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